JAP:NR

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

M 12-050

UNITED STATES OF AMERICA

- against -

WALLY ALONZO,

COMPLAINT

(21 U.S.C. §§ 952(a) and 960)

Defendant.

EASTERN DISTRICT OF NEW YORK, SS:

GREGORY STEMKOWSKI, being duly sworn, deposes and states that he is a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

Upon information and belief, on or about January 16, 2012, within the Eastern District of New York and elsewhere, defendant WALLY ALONZO did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:

- 1. On or about January 16, 2012, WALLY ALONZO arrived at John F. Kennedy International Airport ("J.F.K. Airport") in Queens, New York, from Puerto Plata, Dominican Republic. He arrived aboard Jet Blue flight #812.
- 2. Defendant WALLY ALONZO was selected for a Customs and Border Protection ("CBP") examination. He presented a brown "Slazenger" suitcase and baggage claim tag for that suitcase. The defendant was asked if he owned the brown "Slazenger" suitcase and everything inside and he stated "Yes." Upon inspection, the bottom of the brown "Slazenger" suitcase felt unusually thick and heavy. A probe of the bottom of the suitcase revealed a white powdery substance, which field-tested positive for the presence of cocaine. Defendant WALLY ALONZO was then placed under arrest.
- 3. The total approximate gross weight of the cocaine found in defendant WALLY ALONZO's suitcase is 2,469.9 grams.

Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause, I have not described all the relevant facts and circumstances of which I am aware.

WHEREFORE, your deponent respectfully requests that defendant WALLY ALONZO be dealt with according to law.

GREGORY CTEMKOWSKI

Special Agent

U.S. Department of Homeland Security Homeland Security Investigations

Sworn to before me this 17th day of January, 2012

THE HONORABLE JAMES ORENSTEIN UNITED STATES MAGISTRATE JUDGE EASTERN DISTRICT OF NEW YORK